

**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

UNITED STATES OF AMERICA

Plaintiff,

v.

STATE OF RHODE ISLAND

Defendant.

Case No. CA 13-442

**NOTICE PURSUANT TO SECTION XIX(3) OF
INTERIM SETTLEMENT AGREEMENT**

As required by Section XIX(3) of the Interim Settlement Agreement, Plaintiff United States hereby informs the Court and the State of Rhode Island that it disputes that the State will be in substantial compliance with the Agreement by July 1, 2020 without a course-correcting change in the State's approach to compliance. While the United States acknowledges that the State made initial progress in implementing the Agreement's provisions, recent monitoring has showed that the State's efforts have stalled such that it may not independently act to achieve the requisite outcomes before the Agreement ends. The United States respectfully requests that the Court direct the Interim Court Monitor to begin working with the State immediately to develop and implement a plan for completing the Agreement's highly achievable remaining outcomes, and schedule a status conference with the Parties in January 2020 to address next steps.

Dated: December 23, 2019

Respectfully submitted,

For the United States of America:

Rebecca B. Bond, Chief
Anne S. Raish, Principal Deputy Chief
Jennifer K. McDannell, Deputy Chief

Aaron L. Weisman
U.S. Attorney
District of Rhode Island

/s/ Jillian Lenson

Jillian Lenson
Victoria Thomas
Nicole Kovite Zeitler
Trial Attorneys
Disability Rights Section
Civil Rights Division
U.S. Department of Justice
150 M St, NE, Suite 9-111
Washington, D.C. 20530

/s/ Amy R. Romero

Amy R. Romero
Assistant U.S. Attorney
District of Rhode Island
50 Kennedy Plaza, 8th Floor
Providence, Rhode Island 02903